

COHEN & GREEN

September 6, 2022

BY ECF

Hon. Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

Re: *Payamps v. City of New York, et al.*, 22-cv-00563 (AMD) (VMS)

Your Honor:

I write to make this joint request that the Court extend today's deadline by which the parties must make the filings this Court requires. The parties have now conferred consistent with Fed.R.Civ.P. 26(f), Your Honor's Individual Rules of Practice, and Your Honor's August 23, 2022 Scheduling Order.

The parties jointly request that the deadline to file all Initial Disclosures is extended to September 20, 2020 and that Plaintiff's settlement demand deadline is extended to October 4, 2022. If this motion is granted, the Defendants' deadline to respond to the settlement demand would be October 18, 2022.

There has been no prior application for such relief. If the Court grants the request, it will not extend the date by which all discovery is to be completed in this case.

We thank Your Honor for the Court's attention to this matter.

Respectfully submitted,



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